

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE  
COMMISSION

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF  
OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO UPS INTERROGATORY UPS/USPS-T36-1  
REDIRECTED FROM WITNESS MAYO  
(January 11, 2002)

The United States Postal Service hereby moves for late acceptance of its objection to the following interrogatory of United Parcel Service: UPS/USPS-T36-1, filed on November 15, 2001. This objection was unavoidably delayed due to a number of circumstances. First, the interrogatory in question, although referring to prior responses of witness Mayo which mentioned a Priority Mail service reports, requested information from a Product Tracking system that was outside the scope of witness Mayo's testimony and expertise, and required redirection to the Postal Service in order for a response to be prepared. Unfortunately, it took several days for the redirection to be accomplished, and, many more days in which to bring the interrogatory to the attention of Postal Service personnel familiar with the Product Tracking system in question. More significantly, the personnel qualified to provide information responsive to the interrogatory were then and are now being subjected to reduction-in-force procedures pursuant to a reorganization of Postal Service marketing functions. A high priority for these persons, therefore, has been to find other employment within the Postal Service, and, unfortunately, their support of the ratemaking function had to be subordinated to a significant extent. As a result of this set of circumstances, the remaining qualified personnel were not able to provide to counsel any responsive information until many

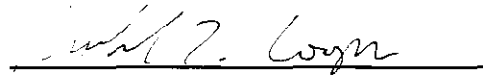
weeks had passed. Recently, when such information was made available, it became apparent that a great deal of the responsive information is commercially sensitive and irrelevant business data that, if provided to UPS or other competitors, would place the Postal Service at a competitive disadvantage.

Rather than waive its objections, which are significant, the Postal Service moves for late acceptance of them. The Postal Service also notes that, over objection, it will soon provide a limited amount of information responsive to the interrogatory similar to that provided in response to interrogatory APMU/USPS-T34-10 in Docket No. R2000-1. As the delay was unavoidable, the Postal Service considers that no party will be unfairly prejudiced by the delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

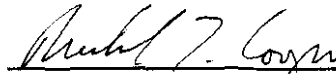
A handwritten signature in dark ink, appearing to read "Richard T. Cooper", is written over a horizontal line.

Richard T. Cooper

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January 11, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Richard T. Cooper

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January 11, 2002